

**NOTICE OF 30-DAY PERIOD  
FOR PUBLIC COMMENT**

Proposed Approval of a Part 70 Permit

for **The Celotex Corporation**  
in **Wabash County**

**Part 70 No.: T169-6367-00001**

Notice is hereby given that the above company located at 1400 West Main Street, Lagro, Indiana, 46941, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Part 70 Permit for the mineral wool and ceiling tile manufacturing source.

Part 70 permits consolidate all applicable air pollution control requirements into one permit. This proposed Part 70 permit includes provisions that ensure that compliance with these requirements can be determined.

This proposed Part 70 permit does not contain any new proposed emission units.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to any air quality issues, interpretation of the state and federal rules, calculations made, technical issues, or the effect that the operation of this source would have on any aggrieved individuals.

A copy of the application and proposed permit is available for examination at the Wabash Carnegie Public Library, 188 West Hill Street, Wabash, Indiana 46992. All statements, along with supporting documentation, should be submitted in writing to the IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If adverse comments concerning the **air pollution impact** of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the OAM, at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have fifteen (15) days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

The Celotex Corporation  
Lagro, Indiana  
Permit Reviewer: SCP/EVP

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Questions should be directed to Scott Pan, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555 ext. 3248 or 1-800-451-6027 press 0 and ask for extension 3-6878.

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

SCP/EVP



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 North Senate Avenue

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Indianapolis, Indiana 46206-

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## PART 70 OPERATING PERMIT OFFICE OF Air QUALITY

**BPB America, Inc.  
1400 West Main Street  
Lagro Indiana 46941**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

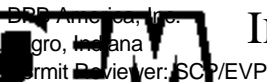
This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T169-6367-00001

Issued by:  
Janet G. McCabe, Assistant Commissioner  
Office of Air Quality

Issuance Date:

Expiration Date:



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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary mineral wool manufacturing source.

Responsible Official:	Arnold Cly
Source Address:	1400 West Main Street, Lagro, Indiana 46941
Mailing Address:	1400 West Main Street, Lagro, Indiana 46941
General Source Phone Number:	(219) 782-2211
SIC Code:	3296
County Location:	Wabash
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, under PSD Rules;
	Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) cupolas, identified as Cupola #2 and Cupola #3, each with a maximum capacity of processing 4.61 tons per hour of raw material, both using one (1) baghouse as particulate matter control, and exhausting through one (1) stack, identified as W23, with only one (1) cupola operating at any given time; and
- (b) Two (2) blow chambers for fiberizing the molten mineral, identified as BC #2 and BC #3, each with a maximum capacity of processing 3.50 tons of molten mineral per hour, using the addition of annealing oil for suppressing the formation of dust and the rotoclones (wet scrubbers) as particulate matter control, and exhausting through six (6) stacks, identified as W17 through W22, with only one (1) blow chamber operating at any given time.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) The following activities with particulate matter emissions equal to or less than 5 pounds per hour or 25 pounds per day:
  - (1) coke, coal, slag and gravel unloading;
  - (2) coke, coal, slag, gravel and wool conveying;
  - (3) coke, coal, slag and gravel silo operations;



- (4) granulators, wool cleaners, balers, star feeder, mixers;

- (5) front end loading;
- (6) dump boxes;
- (7) fines, wool waste, fab waste, gravel, coke, slag, gravel and mixed stockpiles; and
- (8) waste, aluminum foil, wax, guar gum and newsprint handling.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the

attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]



- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted by this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6(2)][IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, any records that must be kept under the conditions of this permit;
- (c) Inspect, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.



- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission units, compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60 Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**C.13 Pressure Gauge Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (  $\pm 2\%$  ) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

---

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

---

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) Two (2) cupolas, identified as Cupola #2 and Cupola #3, each with a maximum capacity of processing 4.61 tons per hour of raw material, both using one (1) baghouse as particulate matter control, and exhausting through one (1) stack, identified as W23, with only one (1) cupola operating at any given time; and
- (b) Two (2) blow chambers for fiberizing the molten mineral, identified as BC #2 and BC #3, each with a maximum capacity of processing 3.50 tons of molten mineral per hour, using the addition of annealing oil for suppressing the formation of dust and the rotoclones (wet scrubbers) as particulate matter control, and exhausting through six (6) stacks, identified as W17 through W22, with only one (1) blow chamber operating at any given time.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [40 CFR Part 63] [326 IAC 2-7-5(1)]

#### D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the two (2) cupolas (#2 and #3) described in this section except when otherwise specified in 40 CFR Part 63, Subpart DDD.

#### D.1.2 Mineral Wool Production NESHAP [40 CFR 63, Subpart DDD]

- (a) Pursuant to 40 CFR 63.1180, the two (2) existing cupolas, identified as Cupola #2 and Cupola #3, are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), (40 CFR 63, Subpart DDD), with a compliance date of June 2, 2002.
- (b) Pursuant to 40CFR Part 63.1178, at all times, except during periods of startup, shutdown, or malfunction, the particulate matter (PM) emissions from cupola #2 and cupola #3, shall each not exceed 0.10 pound of PM per ton of melt.

#### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from each of the two (2) cupolas shall not exceed 11.42 pounds per hour when each is operating at a process weight rate of 4.61 tons of raw material per hour, and the PM from each of the two (2) blow chambers shall not exceed 9.49 pounds per hour when each is operating at a process weight rate of 3.50 tons of molten mineral per hour. The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.



## Compliance Determination Requirements

### D.1.5 Compliance Demonstration [40 CFR Part 63.1190]

The Permittee shall use the following equation to demonstrate compliance with the PM emission limit specified in Condition D.1.2(b) for the cupolas:

$$E = \frac{C \times Q \times K_1}{P}$$

where: E = Emission rate of PM, kg/Mg (lb/ton) of melt.  
C = Concentration of PM, g/dscm (gr/dscf).  
Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr).  
K<sub>1</sub> = Conversion factor, q kg/1,1000 g (1 lb/7,000 gr).  
P = Average melt rate, Mg/hr (ton/hr).

### D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11] [40 CFR Part 63.1188]

The Permittee shall complete the following performance testing to demonstrate compliance with the requirements of 326 IAC 6-3-2 and Subpart DDD no later than June 2, 2002:

- (a) The Permittee shall perform testing in order to demonstrate compliance with Condition D.1.3 for the two cupolas (#2 and #3) for PM utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) The Permittee shall conduct a performance test in order to demonstrate compliance with Condition D.1.2(b) for each cupola as specified in 40 CFR 63.1188 utilizing method as approved by the Commissioner and show compliance with the PM emission limits while the bag leak detection system is installed, operational, and properly adjusted.

### D.1.7 Particulate Matter (PM)

The baghouse for cupola PM control and the rotoclones for blow chamber PM control shall be in operation at all times when the cupolas and the blow chambers are in operation.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.1.8 Baghouse and Rotoclone Inspections

An inspection shall be performed within the last month of each calendar quarter of all bags and the rotoclones controlling the cupolas and blow chambers operations. All defective units shall be replaced.

### D.1.9 Broken or Failed Baghouse and Rotoclone Detection

In the event that bag or rotoclone failure has been observed:

- (a) Bag
  - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) Rotoclone  
Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.10 Cupola Bag Leak Detection System [40 CFR Part 63.1178, 1181, 1184 and 1187] [40 CFR Part 64.8(b) through (d)]

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- (a) To be in compliance with the PM emission limit, pursuant to 40CFR Part 63.1181, the Permittee shall:
  - (1) Install, adjust, maintain, and continuously operate a bag leak detection system for each fabric filter pursuant to 40 CFR Part 63.1184.
  - (2) Begin corrective actions specified in the operations, maintenance, and monitoring plan required by 40CFR Part 63.1187 within one (1) hour after the alarm on a bag leak detection system sounds. Complete the corrective actions in a timely manner.
  - (3) Develop and implement a written QIP consistent with compliance assurance monitoring requirements of 40 CFR Part 64.8(b) through (d) when the alarm on a bag leak detection system sounds for more than five (5%) percent of the total operating time in a six (6)-month reporting period.
- (b) Pursuant to 40CFR Part 63.1178 , the operating limits for each cupola are as follows:
  - (1) Begin within one hour after the alarm on a bag leak detection system sounds, and complete in a timely manner, corrective actions as specified in by the operations, maintenance, and monitoring plan required by 40CFR 63.1178, and

- (2) When the alarm on a bag leak detection system sounds for more than five (5%) percent of the total operating time in a six (6)-month reporting period, the Permittee shall develop and implement a written quality improvement plan (QIP) consistent with the compliance assurance monitoring requirements of 40CFR 64.8(b)–(d).

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.11 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.8 the Permittee shall maintain records of the results of the inspections required under Condition D.1.8 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## **Record Keeping and Reporting Requirements [40 CFR Part 63, Subpart DDD]**

### **D.1.12 Record Keeping Requirements [40CFR Part 63.10(b)] [40 CFR Part 63.1192]**

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Pursuant to 40CFR Part 63.10(b) and 40CFR Part 63.1192, the Permittee shall:

- (a) Maintain files of all information required by 40CFR Part 63.10(b) of the general provisions in Subpart A of this part, including all notifications and reports.
- (b) Maintain records of the following information:
  - (1) Cupola production (melt) rate (tons per hour) of melt.
  - (2) All bag leak detection system alarms. Include the date and time of the alarm, when corrective actions were initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.
- (c) Retain each record for at least five (5) years following the date of each occurrence, measurement, corrective action, maintenance, record, or report. The most recent two (2) years of records must be retained at the facility. The remaining three (3) years of records may be retained off site.

The Indiana State rule cited in Section C - General Record Keeping, which requires the records be kept at the source location for a minimum of three (3) years, is more stringent. Therefore, the Permittee shall maintain the most recent three (3) years of records at the source and the remaining two (2) years of records may be retained off site.

- (d) Retain records on microfilm, on a computer, on computer disks, on magnetic tape disks, or on microfiche.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.13 Reporting Requirements [40CFR Part 63.10(d) and 40 CFR 63.1193]**

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Pursuant to 40 CFR Part 63.1193, the Permittee shall prepare and submit reports to the IDEM, OAQ as required by this subpart and 40CFR Part 63.10 of the general provisions in Subpart A of this part. These reports include, but are not limited to, the following:

- (a) A performance test report, as required by 40CFR Part 63.10(d)(2) of the general provisions in Subpart A of this part, that documents the process and control equipment operating parameters during the test period, the test methods and procedures, the analytical procedures, all calculations, and the results of the performance tests.
- (b) A startup, shutdown, and malfunction plan, as described in 40CFR Part 63.6(e)(3) of the general provisions in Subpart A of this part, that contains specific procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the emission standards. In addition to the information required by 40CFR Part 63.6(e)(3), the plan must include the following:
  - (1) Procedures to determine and record what caused the malfunction and when it began and ended.
  - (2) Corrective actions you will take if a process or control device malfunctions, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
  - (3) An inspection and maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (c) A report of each event as required by 40CFR Part 63.10(b) of the general provisions in subpart A of this part, including a report if an action taken during a startup, shutdown, or malfunction is inconsistent with the procedures in the plan as described in 40CFR Part 63.6(e)(3) of the general provisions in Subpart A of this part.
- (d) An operations, maintenance, and monitoring plan as specified in 40CFR Part 63.1187 of this subpart.
- (e) A semiannual report as required by 40CFR Part 63.10(e)(3) of the general provisions in Subpart A of this part if measured emissions exceed the applicable standard or a monitored parameter varies from the level established during performance testing. The report must contain the information specified in 40CFR Part 63.10(c) of the general provisions, as well as the relevant records required by 40CFR Part 63.1192(b) of this Subpart.
- (f) A semiannual report stating that no excess emissions or deviations of monitored parameters occurred during the reporting period as required by 40CFR Part 63.10 (e)(3)(v) of the general provisions in Subpart A of this part if no deviations have occurred.
- (g) Report the required information on paper or on a labeled computer disk using commonly available and compatible computer software.

#### D.1.14 Notification Requirements [40 CFR Part 63.1191]

Pursuant to 40 CFR Part 63.1191, the Permittee shall submit written notifications to the address listed in Section C - General Reporting Requirements as required by 40 CFR 63.9(b)-(h) of the General Provisions in Subpart A of 40 CFR Part 63.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: BPB America, Inc.  
Source Address: 1400 West Main Street, Lagro, IN 46941  
Mailing Address: 1400 West Main Street, Lagro, IN 46941  
Part 70 Permit No.: T169-6367-00001

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR MANAGEMENT**  
**COMPLIANCE DATA SECTION BRANCH**  
**100 North Senate Avenue**  
**P.O. Box 6015**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: BPB America, Inc.  
Source Address: 1400 West Main Street, Lagro, IN 46941  
Mailing Address: 1400 West Main Street, Lagro, IN 46941  
Part 70 Permit No.: T169-6367-00001

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - ☐ The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: BPB America, Inc.  
Source Address: 1400 West Main Street, Lagro, IN 46941  
Mailing Address: 1400 West Main Street, Lagro, IN 46941  
Part 70 Permit No.: T169-6367-00001

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**



<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Addendum to the Technical Support Document for a Part 70 Operating Permit**

Source Name: **BPB America, Inc.**  
Source Location: **1400 West Main Street, Lagro, Indiana 46941**  
County: **Wabash**  
SIC Code: **3296**  
Operation Permit No.: **T169-6367-00001**  
Permit Reviewer: **Scott Pan/EVP**

On April 8, 1999, the Office of Air Quality (OAQ) had a notice published in the Wabash Plain Dealer, Wabash, Indiana, stating that Celotex Corporation (now BPB America, Inc.) had applied for a Part 70 Operating Permit to operate a mineral wool and ceiling tile manufacturing source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 11, 1999 and June 10, 1999, Celotex Corporation submitted comments on the proposed Part 70 permit. On August 2, 2000, Celotex Corporation sent OAQ a letter stating that, on July 25, 2000, Celotex Corporation sold its plant in Lagro, Indiana to BPB America, Inc. On March 27, 2001, September 19, 2001 and May 9, 2002 BPB America, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

#### **Comment #1:**

Please remove "The" from the company name.

#### **Response #1:**

Since the plant has been sold to BPB America, Inc., the company name has been revised from "The Celotex Corporation" to "BPB America, Inc." throughout the proposed permit.

#### **Comment #2:**

In Section A.1, the Responsible Official should be Rustin Shields and the city name of the plant location should be Lagro. Also, please remove the words "and ceiling tile" from the description of the operation. BPB America no longer manufactures ceiling tile at this facility.

#### **Response #2:**

The name of the Responsible Official (Rustin Shields) was provided by Celotex Corporation before the ownership transfer. Based on the information provided by BPB America, Inc., the Responsible Official at the Lagro plant after the ownership transfer is Arnold Cly. The Responsible Official and city name in Section A.1 have been revised accordingly and the words "and ceiling tile" have been removed from the description of the operation. Although the source is no longer manufacturing ceiling tiles, the applicable requirements for facilities covered under this approval remain the same. This is because the applicable requirements for facilities covered under this approval are based on

maximum raw material throughput of each cupola and blow chamber which remains the same.

**Comment #3:**

In Section A.2(a), the particulate matter control has been change from multicones to a baghouse exhausting through one (1) stack (ID W23). With the installation of the baghouse, BPB America is limited to operating one cupola at any given time due to the capacity of the baghouse.

**Response #3:**

The replacement of muticlones with a baghouse will reduce PTE PM and PM-10 due to improvement of control efficiency, and will not trigger any additional federal or state rules. Pursuant to 326 IAC 2-7-10.5(b), the replacement is allowed without any requirement for prior approval from IDEM. Therefore, the item (a) for both Section A.2 and the equipment description for Section D.1 has been revised as follows:

- (a) Two (2) cupolas, identified as Cupola #2 and Cupola #3, each with a maximum capacity of processing 4.61 tons per hour of raw material, **both using multiclones one (1) baghouse** as particulate matter control, and exhausting through ~~three (3) stacks, identified as W9, W10 and W11~~ **one (1) stack, identified as W23, with only one (1) cupola operating at any given time;**

Additionally, Conditions D.1.4, D.1.5 and D.1.6 (now re-numbered as D.1.7, D.1.8 and D.1.9) have been revised to reflect that inspections will be performed for the baghouse and rotoclones instead of multicones and rotoclones, as follows:

**D.1.47 Particulate Matter (PM)**

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The ~~multiclone~~ **baghouse** for cupola PM control and the rotoclones for blow chamber PM control shall be in operation at all times when the cupolas and the blow chambers are in operation.

**D.1.58 Multiclone Baghouse and Rotoclone Inspections**

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An inspection shall be performed **within the last month of** each calender quarter of ~~the multiclone~~ **all bags** and ~~the~~ rotoclones controlling the cupolas and blow chambers operations ~~when venting to the atmosphere. A multiclone and rotoclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~ All defective units shall be replaced.

**D.1.69 Broken or Failed Multiclone Baghouse and Rotoclone Detection**

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In the event that ~~multiclone bag~~ **and or** rotoclone failure has been observed:

- (a) **Bag**
- (1) **For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**

- (2) **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

**(b) Rotoclone**

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

**Comment #4:**

In Section A.2(b), the maximum capacity of molten mineral processing for each of the two (2) blow chambers should be 3.50 tons per hour. The presently listed processing rate of 2.85 tons per hour was mistakenly stated in the original application. Also, due to the limitation of only one (1) cupola operating at any given time, blow chamber operation will also be limited to only one at any given time.

**Response #4:**

The increase of the maximum processing rate for blow chambers was not due to any modification to these units. This increase of the processing rate was due to an error made by the source when preparing the Title V Permit application and will increase the public noticed PM allowable emissions for the blow chambers by 2.44 lb/hr (from 8.27 lb/hr to 9.49 lb/hr for each of the two blow chambers) or potentially 10.7 ton/yr which shall not trigger any PSD review (326 IAC 2-2). By changing the maximum molten mineral processing rate from 2.85 tons per hour to 3.50 tons per hour, the allowable PM emissions (pursuant to 326 IAC 6-3-2) for each of the two (2) blow chambers are 9.49 lb/hr and the calculated maximum controlled emissions are 4.2 lb/hr (see revised page 2 of 4 TSD Appendix A). The operation of the two (2) blow chambers (only one will be operating at any given time) remains in compliance with 326 IAC 6-3-2 and no other federal or state rules are triggered. Therefore, the item (b) for both Section A.2 and the equipment description for Section D.1 has been revised as follows:

- (b) Two (2) blow chambers for fiberizing the molten mineral, identified as BC #2 and BC #3, each with a maximum capacity of processing ~~2.85~~ **3.50** tons of molten mineral per hour, using the addition of annealing oil for suppressing the formation of dust and the rotoclones (wet scrubbers) as particulate matter control, and exhausting through six (6) stacks, identified as W17 through W22, **with only one (1) blow chamber operating at any given time;**

Additionally, Condition D.1.1 (now re-numbered as D.1.3) has been revised as follows:

**D.1.43 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2, the PM from each of the two (2) cupolas shall not exceed 11.42 pounds per hour when each is operating at a process weight rate of 4.61 tons of raw material per hour, and the PM from each of the two (2) blow chambers shall not exceed ~~8.27~~ **9.49** pounds per hour when each is operating at a process weight rate of ~~2.85~~ **3.50** tons of molten mineral per hour. The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**Comment #5:**

In Section A.2(c), change "Buck planers" to "back planers".

**Response #5:**

Item (c) in Sections A.2 and D.2 has been removed as the result of Comment #9.

**Comment #6:**

Celotex Corporation requests that the time to prepare the required Preventive Maintenance Plans (PMP) as described in Condition B.12 be extended to 120 days. As presently written, the permit requires the completion of all preparation and implementation of the numerous additional plans, monitoring and recordkeeping within the first 90 days after the issuance of the Part 70 permit. It is desired to spread out the work load in order to reduce the burden on facility staff. The Lagro facility is a small facility and most of the burden of complying with the major new monitoring and reporting requirements of the permit will be the responsibility of the Plant Engineer.

**Response #6:**

Condition B.12 already allows Permittee to extend the 90 days time limit, if due to circumstances beyond its control the PMPs cannot be prepared and maintained within the 90 day time frame, for up to an additional 90 days by notifying IDEM, OAQ. Therefore, there is no change to Condition B.12 due to this comment.

**Comment #7:**

Celotex Corporation requests that the period allowed for completing installation of monitoring devices be extended from ninety (90) days after receipt of the permit, as stated in Condition C.11, to one hundred eighty (180) days. The additional time is needed to select, purchase and install the required equipment while continuing to perform the normal maintenance and engineering functions at the facility.

**Response #7:**

Condition C.11 already allows the Permittee to extend the time to meet the compliance schedule for additional ninety (90) days, provided that the Permittee notify OAQ, in writing, prior to the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date. Therefore, there is no change to Condition C.11 due to this comment.

**Comment #8:**

Celotex Corporation requests that the time allowed for preparing the Compliance Response Plan (CRP) be extended from ninety (90) days after the issuance of the permit, as stated in Condition C.16, to one hundred eighty (180) days after the issuance of the permit.

BPB America, Inc.  
Lagro, Indiana  
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**Response #8:**

OAQ considers the implementation of the required CRP as an essential part of being in compliance with the requirements of the Part 70 permit, and the preparation of the CRP should be put as the Permittee's highest priority. OAQ determined that ninety (90) days should be enough for the Permittee to complete this important task, because the source is already aware of the requirement even prior to having a draft for public notice. Therefore, there is no change to Condition C.16 due to this comment.

**Comment #9:**

Celotex Corporation will soon be replacing the existing Sly baghouse controlling the board cutting process with a new Sly baghouse. The new baghouse will have a greater air handling capacity (20,000 acfm) and will be a pulse design. No change will be made to the production operations and there will be no increase in the allowable emissions.

**Response #9:**

Based on the fact that there will be no increase in either the production rate or its allowable emissions or in the compliance monitoring of the baghouse, the replacement of the baghouse will not affect any applicable rule or trigger any new requirement. Since the equipment description for the Sly baghouse, as stated in Section A.2(c), is general, no change to Section A.2(c) regarding the baghouse replacement is needed. This response to comment shall serve as a recognition by OAQ that Celotex Corporation will be replacing the existing Sly baghouse with a new baghouse with greater air handling capacity (20,000 acfm).

**Comment #10:**

Since the end of July, 2001, BPB America, Inc. had shut down the ceiling tile operation and the only operation left at the source is the wool manufacturing. The emission units relating to the ceiling tile operation are items (c), (d) and (e) of Section A.2 and any unit that has to do with starch, clay or dust in Section A.3. All these units have been either removed or permanently disconnected and waiting to be removed from the source. Please remove the sections relating to the ceiling tile operation from the draft permit.

**Response #10:**

The source remains as a PSD major source after the removal of the ceiling tile operation. However, due to the removal of the ceiling tile operation at the source, the following revisions were made to the draft Part 70 permit:

- (1) Sections A.2 and A.3 were revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) cupolas, identified as Cupola #2 and Cupola #3, with a maximum capacity of processing 4.61 tons per hour of raw material, both using baghouse as particulate matter control, and exhausting through one (1) stack, identified as W23, with only one (1) cupola operating at any given time;



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- (b) Two (2) blow chambers for fiberizing the molten mineral, identified as BC #2 and BC #3, each with a maximum capacity of processing 3.50 tons of molten mineral per hour, using the addition of annealing oil for suppressing the formation of dust and the rotoclones (wet scrubbers) as particulate matter control, and exhausting through six (6) stacks, identified as W17 through W22, with only one (1) blow chamber operating at any given time;
- ~~(c) Board cutting process, consisting of back planers, inkers, face planers, face sanders, abraders, cross cutting saws, rip saws and Bevel cutters, controlled by two (2) rooftop baghouses, identified as Sly and Draco, exhausting through Stacks B39 and B40, respectively;~~
- ~~(d) Two (2) low pressure air atomization spray booths, identified as Booths #1 and #2, each with a maximum paint usage rate of 106 pounds per hour, each using a water wall and rooftop Baghouse Draco for overspray control, and both exhausting through stack B40; and~~
- ~~(e) Three (3) natural gas fired board drying ovens, identified as BO #1 — BO #3, each with a rated heat input of twelve (12) million British thermal units (mmBtu) per hour, and exhausting through sixteen (16) rooftop stacks at the Board Plant.~~

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
  - (b) The following activities with particulate matter emissions equal to or less than 5 pounds per hour or 25 pounds per day:
    - (1) coke, coal, slag **and** gravel; ~~starch and clay~~ unloading;
    - (2) coke, coal, slag, gravel, ~~starch,~~ **and** wool; ~~clay and dust~~ conveying;
    - (3) coke, coal, slag **and** gravel; ~~starch and clay~~ silo operations;
    - (4) granulators, wool cleaners, balers, star feeder, mixers;
    - (5) front end loading;
    - (6) dump boxes;
    - (7) fines, wool waste, fab waste, gravel, coke, slag, gravel and mixed stockpiles; **and**
    - (8) ~~dust dumpster loading;~~
    - ~~(9) clay and starch use bins; and~~
    - ~~(10) waste, aluminum foil, wax, guar gum and newsprint handling.~~
- (2) The whole Section D.2 (the section covers the ceiling tile operation) has been removed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Office of Air Quality (OAQ) has been renamed as Office of Air Quality (OAQ). Changes were made throughout the proposed permit to reflect the change.
2. The expiration has been added to the signature box. The Administration and Development Section will be responsible for typing in the issuance date and the expiration date. The expiration is exactly 5 years after the issuance date.

Operation Permit No.: T169-6367-00001	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:  Expiration Date:

3. A.1 (General Information) add the following rule cite which is the definition of a major source in 326 IAC 2-7.

**A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]**

The Permittee owns and operates a stationary mineral wool manufacturing source.

Responsible Official:	<del>Doug Conley</del> <b>Arnold Cly</b>
Source Address:	1400 West Main Street, Lagro, Indiana 46941
Mailing Address:	1400 West Main Street, Lagro, Indiana 46941
<b>General Source</b> Phone Number:	(219) 782-2211
SIC Code:	3296
County Location:	Wabash
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

4. B.1 (Permit No Defense) has been deleted. This is not in IC13, but OAQ does have the general authority for this in 326 IAC 2-7-15. Therefore, most of this language has been added to B.14 (Permit Shield). B.14 provides for when the possession of a permit does provide a defense and provides that it is only for those requirements in existence at the time of permit issuance. All other B conditions have been re-numbered as a result of this change.

**~~B.1 Permit No Defense [IC 13]~~**

- ~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~
- ~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out~~

~~in this permit in the Section B condition entitled "Permit Shield."~~

5. Condition B.2 (now re-numbered as B.1) (Definitions) has been revised to include new language.

**B.21 Definitions [326 IAC 2-7-1]**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any the~~ applicable definitions found in **the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7)** shall prevail.

6. B.3 (now re-numbered as B.2) (Permit Term) language has been added to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be 5 years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

**B.32 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]**

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This permit is issued for a fixed term of five (5) years from the ~~effective~~ **original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

7. Condition B.4 (now re-numbered as B.3) (Enforceability) has been revised to clarify the enforceability of permit conditions.

**B.43 Enforceability [326 IAC 2-7-7(a)]**

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~~(a)~~ **Unless otherwise stated, all** All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, **the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.**

~~(b)~~ **Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.**

8. B.8 (now re-numbered as B.7) (Duty to Supplement and Provide Information) has been reworded to match the language in the rule.

**B.87 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]**

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(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

**The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). **Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]**
- (c) ~~Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit. If The Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with~~ **may include** ~~a claim of confidentiality under in accordance with 326 IAC 17.1. If requested by IDEM, OAM, or the U.S. EPA, to~~ **When** ~~furnishing~~ **When** furnishing copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish record directly to the U. S. EPA. ~~The Permittee may assert along with a claim of confidentiality under in accordance with 40 CFR 2, Subpart B.~~
9. B.9 (now re-numbered as B.8) (Compliance with Permit Conditions) has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act. Also, (d) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures.

**B.98** Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit ~~constitutes a violation of the Clean Air Act and is grounds for:~~
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) **Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.**
- (bc) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

10. Condition B.10 (now re-numbered as B.9) (Certification) paragraph (a) has been revised, since there are currently no certifications that would not be required to be certified by the Responsible Official and paragraph (b) has been modified to clarify when a certification is needed.

**B.409 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted ~~under this permit~~ shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit~~, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification**.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).
11. Condition B.11 (now re-numbered as B.10) (Annual Compliance Certification) paragraph (a) has been revised to clarify that the initial certification is from the date of issuance until Dec. 31. Paragraph (c) has been revised and the word "appropriate" has been added to B.11(c)(1). There is a non-rule policy document for annual compliance certifications which was intended to clarify the requirements of 326 IAC 2-7-6(5). The revision in B.11(c)(1) was made to help clarify the intent which is covered in the NRPD. Also, as part of the U.S. EPA's 1997 Compliance Assurance Monitoring rule making (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997), the language in 40 CFR Part 70.6(c)(5)(iii)(B)) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data" The U.S. District Court of Appeals, Washington D.C. ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used. (NRDC vs. EPA, #97-1727) This change has been made to this permit to be consistent with state and federal law. Paragraph (c) has also been revised so that it matches the language in the rule.

**B.410 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** ~~The certifications~~ shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air ~~Management~~ **Quality**  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was ~~based on~~ continuous or intermittent ~~data~~;
  - (4) The methods used for determining **the** compliance **status** of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
  - (5) ~~Any insignificant activity that has been added without a permit revision; and~~
  - (6) ~~Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.~~

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

12. The record keeping requirements have been added to B.12 (now re-numbered as B.11) (Preventive Maintenance Plan). Also, language has been added to clarify that the PMP and the PMP extension request do not need to be certified by the responsible official. "Preventive Maintenance Plans" has been replaced with "PMPs" throughout the condition, since it has already been defined. In B.12(c) language was added that says the source has a reasonable time to provide a PMP when IDEM, OAQ requests it. Basically "reasonable time" will be defined in the request for the PMP, and a time frame will be included. The record keeping requirements have also been added to the condition.

**B.4211** Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- 
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond ~~it's~~ **the Permittee's** control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety

(90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air ~~Management~~ **Quality**  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

**The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

- (b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ **PMPs** as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement a PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.
  - (c) **A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
  - (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**
13. A reference to the Emergency Occurrence Report Form has been added to B.13 (now re-numbered as B.12) (Emergency Provisions) paragraph (b)(5). The emergency form is for emergencies only , and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. Paragraph (d) part of the first sentence has been deleted. Since this is a TV source, the malfunction rule has been superceded by the emergency rule. Paragraph (f) “compliance” has been changed to “accordance”. Paragraphs (a), (b) and (g) have also been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

**B.4312 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;



- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air ~~Management~~ **Quality**, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted ~~the attached Emergency Occurrence Report Form or its equivalent notice, either in writing by mail or facsimile, of the emergency to:~~

Indiana Department of Environmental Management  
Compliance Branch, Office of Air ~~Management~~ **Quality**  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall

constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

14. Condition B.14 (now re-numbered as B.13) (Permit Shield) has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source and to clarify the intent of the condition. Some of the language from B.1 has been added to the condition. Paragraph (b) has been removed since the new B.14 Prior Permit Conditions Superseded has been added to the permit, it is not necessary for this statement to be in this condition. Some of the paragraph (c) language has been removed because it is unnecessary and would be contradictory to our revising operating permits. Construction permit terms are covered in the definition of applicable requirements. Also, the rule cite in paragraph (g) has been revised to reflect the new Article 2 rule.

**B.4413 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) ~~This condition provides a permit shield as addressed in 326 IAC 2-7-15. Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.~~

**This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.**

- ~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the~~

~~conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that~~

- ~~(1) The applicable requirements are included and specifically identified in this permit; or~~
  - ~~(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
  - (eb) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit,~~ IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
  - (ec) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**
  - (ed) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
    - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
    - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
    - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
    - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
  - (fe) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
  - (gf) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
  - (hg) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]
15. B.15 (Multiple Exceedances) has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed and B.14 (Prior Permit Conditions Superseded) was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

**B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]**

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(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

16. B.16 (now re-numbered as B.15) (Deviations from Permit Requirements and Conditions) has been revised to indicate that OAQ is no longer requiring sources to report deviations in 10 days. The Permittee will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since the 10 day notification has been relaxed to a quarterly report. The condition has also been revised to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)] and to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

**B.4615 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch **Data Section**, Office of Air Management **Quality**  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.~~

**The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement

of the permit or a rule. It does not include:

- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
  - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
  - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~
  - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

- ~~(e) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

17. In condition B.17 (now re-numbered as B16) (Permit Modification, Reopening, Revocation and Reissuance, or Termination), language has been added to clarify that a request to re-open or revoke the permit must be certified by the responsible official, since these are decisions/ actions that will change the status of the source.

**B.4716** Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- 
- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] **The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
  - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
    - (1) That this permit contains a material mistake.
    - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
    - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
  - (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as

expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

- 18. In condition B.18 (now re-numbered as B.17) (Permit Renewal), language has been added to B.18 (a) clarify that The renewal application does require the certification by the responsible official.

**B.4817 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). **The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- 19. B.19 (now re-numbered as B.18) (Permit Amendment or Modification) 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore paragraph (b) has been revised to clarify that. EPA has also requested this change. Also, IDEM, OAQ does not want a source to be liable for both a TV permit violation and a rule violation. By changing paragraph (a) IDEM, OAQ is merely referencing the requirements and not mandating compliance with it.

**B.4918 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) ~~The Permittee must comply with~~ **Permit amendments and modifications are governed by** the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
  - (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air ~~Management~~ **Quality**  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application ~~should~~ **shall** be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule.~~
  - (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- 20. In order to be in consistent with language in 326 IAC 2-7-12(b)(2), the "(D)(i)" of rule listed in (b) of B.19 (Permit Revision Under Economic Incentives and Other Programs) has been removed.
  - 21. Condition B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) has been deleted and condition B.22 (Operational Flexibility), now re-numbered as B.20, has been revised as follows. Both conditions refer to the same rule and it makes more sense for them to be combined.

Condition B.21(e) has been deleted because it is only relevant to a few sources.



**B.220 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any **preconstruction** approval required by 326 IAC ~~2-4~~ **2-7-10.5** has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air ~~Management~~ **Quality**  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c), or (e)(2).

- ~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:**

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change. The notification which shall be submitted **is not considered an application form, report or compliance certification. Therefore, the notification** by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) ~~Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~
22. Condition B.23 has been renumbered as B.21 and renamed Source Modification Requirement. The condition has been rewritten to include requirements for source modifications.
- B.231 Construction Permit Requirement [326 IAC 2-7-10.5] Source Modification Requirement [326 IAC 2-7-10.5]**  

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, A modification, construction, or reconstruction shall be approved as if required by and in accordance with the applicable provisions of 326 IAC 2-7-10.5. **A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.**
23. Condition B.24 (now renumbered B.22) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have, and to clarify confidentiality. Also, "At reasonable times" has been deleted from the condition, because neither the rule nor the statute limit us. OAQ could ask for those things at any time.
- B.242 Inspection and Entry [326 IAC 2-7-6(2)] [IC 13-14-2-2]**  

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:
- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, ~~at reasonable times~~, any records that must be kept under the conditions of this permit;
- (c) Inspect, ~~at reasonable times~~, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor, ~~at reasonable times~~, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

- ~~(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~
- ~~(2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

24. 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official, therefore B.25 (now re-numbered as B.23) (Transfer of Ownership or Operational Control) has been revised to clarify that. EPA has also requested this change.

**B.2523** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air **Management Quality**  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

25. The rule cite has been added to Condition B.26 (now renumbered B.24) (Annual Fee Payment) paragraph (a) and paragraph (b) has been revised to clarify the Permittee's responsibility for the

timely payment of annual fees.

**B.264 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. **Pursuant to 326 IAC 2-7-19(b)**, if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) **Failure Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

26. Condition C.4 (Incineration) has been revised to say that 326 IAC 9-1-2 is not federally enforceable.

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **326 IAC 9-1-2 is not federally enforceable.**

27. Condition C.6 (Operation of Equipment) has been revised as follows:

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

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**Except as otherwise provided by statute, rule, or in this permit, All** all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are operation.

28. C.7 (Stack Height) language has been added to clarify which parts of 326 IAC 1-7 are not federally enforceable.

**C.7 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.**

29. The rule cite in the title of C.8 (Asbestos Abatement Projects) was changed to make it more generalized and paragraph (d) has been revised so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] ~~[40 CFR 61.140]~~ [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or

before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

**The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.** The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
  - (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, **pursuant to the provisions of 40 CFR 61, Subpart M**, is federally enforceable.
30. Condition C.9 (Performance Testing) is revised to specify the locations of applicable procedures and analysis methods for performance testing, add a notification requirement, and to clarify that any submittal under this condition does not require a certification by a responsible official:

**C.9 Performance Testing [326 IAC 3-6]**

- 
- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40**

**CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAQ.  
A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~ **The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (b) ~~All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.~~ **The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (c) **Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.**

~~The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

31. Condition C.10 (Compliance Schedule) was removed from the Title V permit because it is an application requirement, not a permit requirement. A new section, Compliance Requirements, and a new condition (Compliance Requirements) has been added that refers to IDEM, OAQ's general compliance authority in 326 IAC 2-1.1-11 and reads as follows:

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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**The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.**

32. Condition C.11 (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring and to clarify when compliance monitoring must begin:

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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~~Compliance with applicable requirements shall be documented as required by this permit. Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the~~ The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, ~~no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met that equipment cannot be installed and operated within ninety (90) days,~~ the Permittee may extend the compliance schedule **related to the equipment for** an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air ~~Management~~ **Quality**  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Unless otherwise specified in the approval for the new emission units, compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.**

33. Condition C.12 (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit, as follows:

C.12 Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**

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Any monitoring or testing **required by Section D** ~~performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.~~

34. C.13 (Pressure Gauge Specifications) rule cites have been added. Language has been added for other instrument specifications.

C.13 Pressure Gauge Specifications **[326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (  $\pm 2\%$  ) of full scale reading.
- (b) **The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.**



35. Condition C.15 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68. Part (b) was removed because it is repetitive of (a)(2) (now (b)). They both required the same thing, and the source does not need to separately certify RMP compliance. The condition has also been revised to reflect that if a source is subject to 40 CFR 68, they should have already submitted a Risk Management Plan.

**C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall **submit**:

- ~~\_\_\_\_\_ (a) Submit:~~
- (1a) A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a); or~~
- (2b) As a part of the **annual** compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); ~~and~~
- ~~\_\_\_\_\_ (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.~~
- ~~\_\_\_\_\_ (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.~~

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

36. The IDEM, OAQ has restructured C.16 to clarify the contents and implementation of the compliance response plan. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. Also, in Condition C.15(c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed.

**C.16 Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to **prepare** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:~~
- ~~\_\_\_\_\_ (1) This condition;~~
- ~~\_\_\_\_\_ (2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~\_\_\_\_\_ (3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~\_\_\_\_\_ (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5)~~ ~~A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. ~~A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee,~~ **supplemented from time to time by the Permittee, and maintained on site, and is comprised of:**

~~(A1)~~ **Reasonable** response steps that ~~will~~ **may** be implemented in the event that ~~compliance-related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

~~(B)~~ ~~A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

**(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**

**(b)** For each compliance monitoring condition of this permit, ~~appropriate~~ **reasonable** response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan shall constitute a violation of the permit. unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~

**(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**

**(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**

**(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**

**(4) Failure to take reasonable response steps shall constitute a violation of the permit.**

- (c) ~~After investigating the reason for the excursion the~~ **The Permittee is excused from taking not required to take any** further response steps for any of the following reasons:
- (1) ~~The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~ **A false reading occurs due to the malfunction of the monitoring equipment and**
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned **or is returning** to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)(e)~~ Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.**
37. Condition C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test) has been revised as follows:
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]
- 
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate ~~corrective~~ **response** actions. The Permittee shall submit a description of these ~~corrective~~ **response** actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize **excess** emissions from the affected facility while the ~~corrective~~ **response** actions are being implemented. ~~IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~
- (c) **IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.**

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

38. In condition C.18 (Emission Statement), language was added to clarify that emission statements should be certified by the responsible official and that regulated pollutants are defined in 326 IAC 2-7-1.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate **estimated** actual emissions of other regulated pollutants **(as defined by 326 IAC 2-7-1)** from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air ~~Management~~ **Quality**  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

**The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

39. Condition C.19 (Monitoring Data Availability) has been removed since it has been incorporated into C.16 (Compliance Response Plan - Preparation, Implementation, Records, and Reports).
40. Condition C.20 (now renumbered as C.19) (General Record Keeping Requirements) is revised to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language. "monitoring" was removed so that the condition will be more generalized to all record keeping, "reports" was added to clarify that the source must keep copies of those as well. Paragraphs (b) and (c) have been removed because they were unnecessary. If the recording of the information is required, it would be specified in D sections or elsewhere in the permit. Also, part (c)(4) has been modified.

**C.2019 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

- (a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request of an IDEM, OAM representative~~. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- ~~(b) Records of required monitoring information shall include, where applicable:~~
- ~~(1) The date, place, and time of sampling or measurements;~~
- ~~(2) The dates analyses were performed;~~
- ~~(3) The company or entity performing the analyses;~~
- ~~(4) The analytic techniques or methods used;~~
- ~~(5) The results of such analyses; and~~
- ~~(6) The operating conditions existing at the time of sampling or measurement.~~
- ~~(c) Support information shall include, where applicable:~~
- ~~(1) Copies of all reports required by this permit;~~
- ~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~
- ~~(3) All calibration and maintenance records;~~
- ~~(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All~~

~~records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

~~(d)~~**(b) Unless otherwise specified in this permit**, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

41. Condition C.21(now renumbered as C.20)(General Reporting Requirements) the Semi-Annual Compliance Monitoring Report is now the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report has been removed, all the information is in B.13. In paragraph (d) it is clarified that the report does need to be certified by the responsible official, this change is also reflected in all the D sections and the reporting forms. EPA has also requested this change. Part (g) has been revised to clarify that quarters and semi-annual reports are based on a calendar year, not on when the permit is issued. Condition C.21 (now re-numbered as C.20) is revised as follows:

~~C.21~~**20** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit ~~a~~ **the attached Semi-Annual Quarterly Deviation and Compliance Monitoring Report or its equivalent.** Any deviation from ~~the permit~~ requirements, ~~and, the date(s) of each deviation, the cause of the deviation, and the response steps taken~~ must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and Compliance Monitoring Report** shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air ~~Management~~ **Quality**  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, ~~any semi-annual~~ **all reports required in Section D of this permit** shall be submitted within thirty (30) days of the end of the reporting period. ~~The All reports does not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

BPB America, Inc.  
Lagro, Indiana  
Permit Reviewer: SCP/EVP

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~~(g)~~(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

42. The follow language has been added to every Facility Description Box to clarify that facility descriptions are not enforceable:

**The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

43. New Conditions D.1.1 and D.1.2 have been added to Section D.1 of the permit to require the Permittee to be in compliance with NESHAP, 326 IAC 20-14, (40 CFR 63, Subpart DDD) by the compliance date. The rest of Section D.1 has been re-numbered to account for the addition of Conditions D.1.1 and D.1.2.

**D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]**

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the two (2) cupolas (#2 and #3) described in this section except when otherwise specified in 40 CFR Part 63, Subpart DDD.

**D.1.2 Mineral Wool Production NESHAP [40 CFR 63, Subpart DDD]**

- (a) Pursuant to 40 CFR 63.1180, the two (2) existing cupolas, identified as Cupola #2 and Cupola #3, started operation in 1942, are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR 63, Subpart DDD), with a compliance date of June 2, 2002.
- (b) Pursuant to 40CFR Part 63.1178, at all times, except during periods of startup, shutdown, or malfunction, the particulate matter (PM) emissions from cupola #2 and cupola #3, shall each not exceed 0.10 pound of PM per ton of melt.

44. Condition D.1.5 was added to show the equation the Permittee shall use to demonstrate compliance with the PM emission limit specified in Condition D.1.2(b), as follows:

**D.1.5 Compliance Demonstration [40 CFR Part 63.1190]**

The Permittee shall use the following equation to demonstrate compliance with the PM emission limit specified in Condition D.1.2(b) for the cupolas:

$$E = \frac{C \times Q \times K_1}{P}$$

where: E = Emission rate of PM, kg/Mg (lb/ton) of melt.  
C = Concentration of PM, g/dscm (gr/dscf).  
Q = Volumetric flow rate of exhaust gases, dscm/hr (dscf/hr).  
K<sub>1</sub> = Conversion factor, q kg/1,000 g (1 lb/7,000 gr).  
P = Average melt rate, Mg/hr (ton/hr).



45. Condition D.1.3 (Testing Requirements) (now re-numbered as D.1.6) has been revised to satisfy the testing requirements of both 40 CFR Part 63 and 326 IAC 6-3-2.

**D.1.36 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11] [40 CFR Part 63.1188]**

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~~During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform testing for PM emissions from one (1) of the two (2) cupolas utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. The Permittee shall complete the following performance testing to demonstrate compliance with the requirements of 326 IAC 6-3-2 and Subpart DDD no later than June 2, 2002:~~

- (a) The Permittee shall perform testing in order to demonstrate compliance with Condition D.1.3 for the two cupolas (#2 and #3) for PM utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.**
  - (b) The Permittee shall conduct a performance test in order to demonstrate compliance with Condition D.1.2(b) for each cupola as specified in 40 CFR 63.1188 utilizing method as approved by the Commissioner and show compliance with the PM emission limits while the bag leak detection system is installed, operational, and properly adjusted.**
46. Conditions D.1.5 (Visible Emissions Notations) and D.1.6 (Parametric Monitoring) have been removed. Subpart DDD requires that the baghouses, which are to be installed to control PM emissions from the two (2) cupolas, each be equipped with a bag leak detection system for detecting potential problems of the baghouse operations (see Item #46 of OAQ revisions). Utilizing a bag leak detection system, which directly and continuously check the baghouses' operations, is a more reliable method of assuring proper baghouse operations than monitoring with visible emissions notations and parameter (i.e. pressure drop) record keeping.
47. A new Condition D.1.10 (Cupola Bag Leak Detection System) has been added to Section D.1 of the permit to require the Permittee to be in compliance with 40 CFR Part 63).

**D.1.10 Cupola Bag Leak Detection System [40 CFR Part 63.1178, 1181, 1184 and 1187] [40 CFR Part 64.8(b) through (d)]**

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- (a) To be in compliance with the PM emission limit, pursuant to 40CFR Part 63.1181, the Permittee shall:**
  - (1) Install, adjust, maintain, and continuously operate a bag leak detection system for each fabric filter pursuant to 40 CFR Part 63.1184.**
  - (2) Begin corrective actions specified in the operations, maintenance, and monitoring plan required by 40CFR Part 63.1187 within one (1) hour after the alarm on a bag leak detection system sounds. Complete the corrective actions in a timely manner.**
  - (3) Develop and implement a written QIP consistent with compliance assurance monitoring requirements of 40 CFR Part 64.8(b) through (d) when the alarm on a bag leak detection system sounds for more than five (5%) percent of the total operating time in a six (6)-month reporting period.**

(b) Pursuant to 40CFR Part 63.1178 , the operating limits for each cupola are as follows:

- (1) Begin within one hour after the alarm on a bag leak detection system sounds, and complete in a timely manner, corrective actions as specified in by the operations, maintenance, and monitoring plan required by 40CFR 63.1178, and
- (2) When the alarm on a bag leak detection system sounds for more than five (5%) percent of the total operating time in a six (6)-month reporting period, the Permittee shall develop and implement a written quality improvement plan (QIP) consistent with the compliance assurance monitoring requirements of 40CFR 64.8(b)–(d).

48. Condition D.1.9 (Record Keeping Requirements) (now re-numbered as D.1.11) has been revised as follows:

**D.1.911 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.78, the Permittee shall maintain records of the results of the inspections required under Condition D.1.78 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

49. A new subsection “**Record Keeping and Reporting Requirements [40 CFR Part 63, Subpart DDD]**” has been added to Section D.1 in accordance with the requirements of 40 CFR Part 63, Subpart DDD, as follows:

**Record Keeping and Reporting Requirements [40 CFR Part 63, Subpart DDD]**

**D.1.12 Record Keeping Requirements [40CFR Part 63.10(b)] [40 CFR Part 63.1192]**

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Pursuant to 40CFR Part 63.10(b) and 40CFR Part 63.1192, the Permittee shall:

- (a) Maintain files of all information required by 40CFR Part 63.10(b) of the general provisions in Subpart A of this part, including all notifications and reports.
- (b) Maintain records of the following information:
  - (1) Cupola production (melt) rate (tons per hour) of melt.
  - (2) All bag leak detection system alarms. Include the date and time of the alarm, when corrective actions were initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.
- (c) Retain each record for at least five (5) years following the date of each occurrence, measurement, corrective action, maintenance, record, or report. The most recent two (2) years of records must be retained at the facility. The remaining three (3)

years of records may be retained off site.

The Indiana State rule cited in Section C - General Record Keeping, which requires the records be kept at the source location for a minimum of three (3) years, is more stringent. Therefore, the Permittee shall maintain the most recent three (3) years of records at the source and the remaining two (2) years of records may be retained off site.

- (d) Retain records on microfilm, on a computer, on computer disks, on magnetic tape disks, or on microfiche.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.13 Reporting Requirements [40CFR Part 63.10(d) and 40 CFR 63.1193]**

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Pursuant to 40 CFR Part 63.1193, the Permittee shall prepare and submit reports to the IDEM, OAQ as required by this subpart and 40CFR Part 63.10 of the general provisions in Subpart A of this part. These reports include, but are not limited to, the following:

- (a) A performance test report, as required by 40CFR Part 63.10(d)(2) of the general provisions in Subpart A of this part, that documents the process and control equipment operating parameters during the test period, the test methods and procedures, the analytical procedures, all calculations, and the results of the performance tests.
- (b) A startup, shutdown, and malfunction plan, as described in 40CFR Part 63.6(e)(3) of the general provisions in Subpart A of this part, that contains specific procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and control systems used to comply with the emission standards. In addition to the information required by 40CFR Part 63.6(e)(3), the plan must include the following:
  - (1) Procedures to determine and record what caused the malfunction and when it began and ended.
  - (2) Corrective actions you will take if a process or control device malfunctions, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
  - (3) An inspection and maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (c) A report of each event as required by 40CFR Part 63.10(b) of the general provisions in subpart A of this part, including a report if an action taken during a startup, shutdown, or malfunction is inconsistent with the procedures in the plan as described in 40CFR Part 63.6(e)(3) of the general provisions in Subpart A of this part.

- (d) **An operations, maintenance, and monitoring plan as specified in 40CFR Part 63.1187 of this subpart.**
- (e) **A semiannual report as required by 40CFR Part 63.10(e)(3) of the general provisions in Subpart A of this part if measured emissions exceed the applicable standard or a monitored parameter varies from the level established during performance testing. The report must contain the information specified in 40CFR Part 63.10(c) of the general provisions, as well as the relevant records required by 40CFR Part 63.1192(b) of this Subpart.**
- (f) **A semiannual report stating that no excess emissions or deviations of monitored parameters occurred during the reporting period as required by 40CFR Part 63.10(e)(3)(v) of the general provisions in Subpart A of this part if no deviations have occurred.**
- (g) **Report the required information on paper or on a labeled computer disk using commonly available and compatible computer software.**

**D.1.14 Notification Requirements [40 CFR Part 63.1191]**

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**Pursuant to 40 CFR Part 63.1191, the Permittee shall submit written notifications to the address listed in Section C - General Reporting Requirements as required by 40 CFR 63.9(b)-(h) of the General Provisions in Subpart A of 40 CFR Part 63.**

- 50. There was no Section D added for the insignificant activities included in Section A.3 which are specifically regulated, as defined in 326 IAC 2-7-1(21). All the insignificant activities included in Section A.3 have process weight rate less than 100 pounds per hour and are subject to the requirements of Condition C.1. Also, because the source is located in Wabash county and all the degreasing operations at the source started prior to January 1, 1980, the degreasing operations at the source are not subject to the requirements of 326 IAC 8-3.
- 51. Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the Compliance Branch, not the Compliance Data Section. US EPA has agreed to allow the 2 day notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official, therefore will comply with the Part 70 requirement to have all reports certified.
- 52. The Semi-Annual Compliance Monitoring Report, is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. OAQ is no longer requiring sources to report deviations in ten days, therefore every source will need to submit this report quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR MANAGEMENT**  
**COMPLIANCE DATA SECTION BRANCH**  
**100 North Senate Avenue**  
**P.O. Box 6015**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: BPB America, Inc.  
Source Address: 1400 West Main Street, Lagro, IN 46941  
Mailing Address: 1400 West Main Street, Lagro, IN 46941  
Part 70 Permit No.: T169-6367-00001

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9 1.** — This is an emergency as defined in 326 IAC 2-7-1(12)  
☒ The Permittee must notify the Office of Air Management **Quality (OAMQ)**, within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
☒ The Permittee must submit notice in writing by mail or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

- 9 2.** — This is a deviation, reportable per 326 IAC 2-7-5(3)(C)  
☒ The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/ <del>Deviation</del> started:
Date/Time Emergency/ <del>Deviation</del> was corrected:
Was the facility being properly operated at the time of the emergency/ <del>deviation</del> ?      Y      N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/ <del>deviation</del> :
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
~~SEMI-ANNUAL~~ QUARTERLY DEVIATION and COMPLIANCE MONITORING  
REPORT**

Source Name: BPB America, Inc.  
Source Address: 1400 West Main Street, Lagro, IN 46941  
Mailing Address: 1400 West Main Street, Lagro, IN 46941  
Part 70 Permit No.: T169-6367-00001

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the ~~compliance monitoring~~ requirements stated in this permit. This report shall be submitted ~~semi-annually~~ **quarterly** based on a calendar year. Any deviation from the ~~compliance monitoring~~ requirements, and the date(s) of each deviation, **the probable cause of the deviation, and the response steps taken** must be reported. ~~with the following exceptions:~~ **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.** Additional pages may be attached if necessary. ~~This form can be supplemented by attaching the Emergency/Deviation Occurrence Report.~~ If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Compliance Monitoring Permit Requirement** (specify permit condition #)

Date of each Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

**Compliance Monitoring Permit Requirement** (specify permit condition #)

Date of each Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

**Response Steps Taken:**



<b>Compliance Monitoring Permit Requirement</b> (specify permit condition #)	
<b>Date of each Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Compliance Monitoring Permit Requirement</b> (specify permit condition #)	
<b>Date of each Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Compliance Monitoring Permit Requirement</b> (specify permit condition #)	
<b>Date of each Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Management

## Technical Support Document (TSD) for a Part 70 Operating

### Source Background and Description

**Source Name:** The Celotex Corporation  
**Source Location:** 1400 West Main Street, Lagro, Indiana 46941  
**County:** Wabash  
**SIC Code:** 3296  
**Operation Permit No.:** T169-6367-00001  
**Permit Reviewer:** Scott Pan/Env

The Office of Air Management (OAM) has reviewed a Part 70 permit application from The Celotex Corporation relating to the operation of a mineral wool and ceiling tile manufacturing source.

### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) cupolas, identified as Cupola #2 and Cupola #3, each with a maximum capacity of processing 4.61 tons per hour of material, using multiclones as particulate matter control, and exhausting through three (3) stacks, identified as W9, W10 and W11;
- (b) Two (2) blow chambers for fiberizing the molten mineral using the addition of annealing oil for suppressing the formation of dust, identified as BC #2 and BC #3, each with a maximum capacity of processing 2.85 tons of molten mineral per hour, using the rotoclones (wet scrubbers) as particulate matter control, and exhausting through six (6) stacks, identified as W17 through W22;
- (c) Board cutting process, consisting of Buck planers, inkers, face planers, face sanders, abraders, cross cutting saws, rip saws and Bevel cutters, controlled by two (2) rooftop baghouses, identified as Sly and Draco, exhausting through Stacks B39 and B40, respectively;
- (d) Two (2) low pressure air atomization spray booths, identified as Booths #1 and #2, each with a maximum paint usage rate of 106 pounds per hour, each using a water wall and rooftop Baghouse Draco for overspray control, and both exhausting through same stack B40; and
- (e) Three (3) natural gas fired board drying ovens, identified as BO #1 - BO #3, each with a rated heat input of twelve (12) million British thermal units (mmBtu) per hour, and exhausting through sixteen (16) rooftop stacks at the Board Processing Plant.

### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units (mmBtu) per hour:
  - (1) two (2) natural gas fired preheaters, identified as Preheaters #2 and #3, each with a rated heat input of 7.5 mmBtu/hr, each exhausting through one (1) stack, identified as W6 and W3, respectively;
  - (2) two (2) natural gas fired ovens for the paint booths, each with a rated heat input capacity of 2.0 mmBtu/hr; and
  - (3) miscellaneous natural gas fired heating units and water heaters with a total rated heat input of 2.28 mmBtu/hr.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, having a storage capacity less than or equal to 10,500 gallons.
- (c) VOC storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (g) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kPa; 15mmHg; or 0.3 psi measured at 38 degree C (100°F) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mmHg; or 0.1 psi measured at 20 degree C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (i) Closed loop heating and cooling systems.
- (j) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (l) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (m) Forced and induced draft cooling tower system not regulated under a NESHA.
- (n) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (o) Trimmers that do not produce fugitive emissions and that are equipped with a dust

collection or trim material recovery device such as a bag filter or cyclone.

- (p) Paved parking lot with public access.
- (q) Covered coke conveyors conveying less than or equal to 360 tons per day.
- (r) Asbestos abatement projects regulated by 326 IAC 14-10.
- (s) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (t) Stationary fire pumps.
- (u) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (v) The following activities with particulate matter emissions equal to or less than 5 pounds per hour or 25 pounds per day:
  - (1) coke, coal, slag, gravel, starch and clay unloading;
  - (2) coke, coal, slag, gravel, starch, wool, clay and dust conveying;
  - (3) coke, coal, slag, gravel, starch and clay silo operations;
  - (4) granulators, wool cleaners, balers, star feeder, mixers;
  - (5) front end loading;
  - (6) dump boxes;
  - (7) fines, wool waste, fab waste, gravel, coke, slag, gravel and mixed stockpiles;
  - (8) dust dumpster loading;
  - (9) clay and starch use bins; and
  - (10) waste, aluminum foil, wax, guar gum and newsprint handling.
- (w) The following activities with VOC emissions equal to or less than 3 pounds per hour or 15 pounds per day:
  - (1) ink;
  - (2) packaging printing and gluing; and
  - (3) two (2) paint mixing and four (4) paint holding tanks.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 85-12-85-0134 issued on December 18, 1981;
- (b) OP 85-12-85-0135 issued on December 18, 1981;
- (c) OP 85-12-85-0136, issued on December 18, 1981;
- (d) OP 85-12-85-0137, issued on December 18, 1981; and
- (e) OP 85-12-85-0138, issued on December 18, 1981.

All conditions from previous approvals were incorporated into this Part 70 permit.

### Enforcement Issue

There are no enforcement actions pending.

## Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete Part 70 permit application for the purposes of this review was received on August 5, 1996. Additional information received on September 16, 1996 makes the Part 70 permit application administratively complete.

A notice of completeness letter was mailed to the source on September 20, 1996.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 pages).

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential Emissions (tons/year)
PM	Greater than 250
PM-10	Greater than 250
SO <sub>2</sub>	Greater than 100 and less than 250
VOC	Greater than 250
CO	Greater than 250
NO <sub>x</sub>	Less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Carbony Sulfide (COS)	Greater than 10
TOTAL	Greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10, SO<sub>2</sub>, VOC and CO are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards

that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	86.1
PM-10	75.0
SO <sub>2</sub>	236.6
VOC	39.1
CO	7387.8
NO <sub>x</sub>	57.0
HAP (specify)	N/A

Note: No previous HAP emission data has been received from the source.

### Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAP (COS)
Cupolas	79.9	79.9	199.7	1.7	6241.5	39.9	102.6
Annealing Oil Addition	0.0	0.0	0.0	49.5	0.0	0.0	0.0
Blow Chambers	30.0	30.0	2.2	3.5	0.0	0.2	0.0
Surface Coating	2.8	2.8	0	287.9	0	0	0
Natural Gas Combustion	1.9	1.9	0.2	1.4	21.1	25.1	0.0
Board Cutting	0.2	0.2	0.0	0.0	0.0	0.0	0.0
Total Emissions	114.8	114.8	202.1	344.0	6262.6	65.2	102.6

### County Attainment Status

The source is located in Wabash County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment

Lead	Attainment
------	------------

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Wabash County has been designated as attainment or unclassifiable for ozone.

#### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

#### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The proposed National Emission Standards for Hazardous Air Pollutants (HESHAP), 40 CFR 63. Subpart DDD (National Emission Standards for Hazardous Air Pollutants for Mineral Wool Manufacturing) will apply to the two (2) cupolas based on the applicability of the rule as drafted. The draft has been promulgated and awaits final approval from the United States Environmental Protection Agency (U.S. EPA). The source will be subject to all provisions of this rule once finalized.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration, PSD)**

This mineral wool and ceiling tile manufacturer is a major stationary source because its potential to emit (PTE) for both VOC and CO is greater than 250 tons per year. The source was constructed prior to the 326 IAC 2-2 applicability date of August 7, 1977 and all modifications to the source since August 7, 1977 had PTE increases less than significant PSD modification thresholds for all criteria pollutants. Therefore, the requirements of 326 IAC 2-2 do not apply.

##### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM-10, SO<sub>2</sub> and CO. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

##### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.



- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-4 (Fugitive Dust Emissions)**

This source is subject to 326 IAC 6-4 fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2 (1), (2), or (3).

**State Rule Applicability - Individual Facilities**

**326 IAC 6-3-2 (Process Operations)**

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emissions from different emission units at the sources shall be limited as listed in the following table:

Process Description	Max. Process Weight Rate (ton/hr)	326 IAC 6-3-2 <sup>(1)</sup> Allowable (lb/hr)	Control Device	Control Efficiency (%)	Controlled <sup>(2)</sup> Potential (lb/hr)	Compliance (Y/N)
Cupola #2	4.61	11.42	Multiclones	90.0%	9.12	Y
Cupola #3	4.61	11.42	Multiclones	90.0%	9.12	Y
Blow Chamber #2	2.85	8.27	Rotoclone	95.0%	3.42	Y
Blow Chamber #3	2.85	8.27	Rotoclone	95.0%	3.42	Y
Board Cutting	2.57	7.72	Baghouse	99.0%	0.06	Y

Notes: (1) Allowable emissions are calculated with the following equations:  

$$E = 4.10 P^{0.67}$$
for P equal to or less than 30 tons per hour  
where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

(2) See detailed calculations in pages 1 - 5 of Appendix A.

Emissions from the Cupolas #2 and #3, Blow Chambers #2 and #3, and board cutting operations are in compliance with 326 IAC 6-3-2, by utilizing multiclones, rotoclones and baghouses, respectively, as particulate emission control.

**326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)**

The three (3) natural gas fired board ovens are not subject to the requirements of 326 IAC 6-2, because these are not indirect heating facilities.

**326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)**

The sulfur dioxide emissions from the two (2) cupolas are not subject to the requirements of 326 IAC 7-1.1, because the cupolas shall not burn coal or oil.

**326 IAC 8-1-6 (General Reduction Requirements)**

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of article 8. VOC emissions from the annealing oil addition and board spray coating processes (Booths #1 and #2) are not subject to the requirements of 326 IAC 8-1-6, because the mineral wool manufacturing operation

started the operation before 1942 and the board manufacturing operation started in 1951.

**326 IAC 8-3 (Organic Solvent Degreasing Operation)**

The degreasing operations at the source are not subject to the requirements of 326 IAC 8-3, because the source is located in Wabash county and the degreasing operations at the source started prior to January 1, 1980. Pursuant to 326 IAC 8-3-1, the requirements of 326 IAC 8-3 do not apply

**326 IAC 9-1-2 (Carbon Monoxide Emission Limits)**

The source is not subject to the requirement of 326 IAC 9-1-2 (Carbon Monoxide Emission Limits), because the source commenced the cupola operations before 1942 which is prior to the rule applicability date of March 21, 1972.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (1) The Cupolas #2 and #3 have applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emissions notations of the cupola stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (b) The Permittee shall record the total static pressure drop across the multiclones controlling the cupolas, at least once daily when the cupolas are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the multiclones shall be maintained within the range of 1.5 to 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (c) An inspection shall be performed each calendar quarter of the multiclone controlling the cupolas when venting to the atmosphere. A multiclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective units shall be replaced.
- (d) The owner or operator shall comply with the compliance monitoring applicable to the two (2) cupolas under 40 CFR 63, Subpart DDD, upon final approval of the rule.

These monitoring conditions are necessary because the multiclones for the cupolas must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (2) The Blow Chambers #2 and #3 have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the blow chamber stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) The Permittee shall record the total static pressure drop across the rotoclones controlling the blow chambers, at least once daily when the cupolas are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the rotoclones shall be maintained within the range of 4.0 to 7.5 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (c) An inspection shall be performed each calendar quarter of the rotoclone controlling the blow chambers operation when venting to the atmosphere. A rotoclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective units shall be replaced.

These monitoring conditions are necessary because the rotoclones for the blow chambers must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (3) The board cutting and board spray coating operations have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the board cutting and board spray coating operations stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (b) The Permittee shall record the total static pressure drop across the baghouses controlling the board cutting and board spray coating operations, at least once daily when the board cutting and board spray coating are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 7.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (c) An inspection shall be performed each calendar quarter of all bags controlling the board cutting processes and the paint spray booths operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouse for the board cutting operation must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (page 2 of 4 TSD Appendix A).

### **Conclusion**

The operation of this mineral wool and ceiling tile manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T169-6367-00001**.

**Appendix A: Emission Calculations  
(Source Wide Summary)**

Company Name: The Celotex Corporation  
Address City IN Zip: 1400 West Main Street, Lagro, IN  
CP: T169-6367  
Plt ID: T169-00001  
Reviewer: Scott Pan/EVP  
Date: Nov. 6, 1998

**Potential Emissions (tons/year, uncontrolled)**

Emissions Generating Activity							
Pollutant	Cupolas	Annealing Oil Addition	Blow Chambers	Surface Coating	Board ** Cutting	Combustion	Total Emissions (tons/yr)
PM	399.5	0.0	299.6	278.6	13.4	1.9	993.0
PM10	399.5	0.0	299.6	278.6	12.3	1.9	991.9
SO2	199.7	0.0	2.2	0.0	0.0	0.2	202.1
NOx	39.9	0.0	0.2	0.0	0.0	25.1	65.2
VOC	1.7	49.5	3.5	287.9	0.0	1.4	344.0
CO	6241.5	0.0	0.0	0.0	0.0	21.1	6262.6
Total HAPs	102.6	0.0	0.0	0.0	0.0	0.0	102.6
Worst Case Single HAP	102.6	0.0	0.0	0.0	0.0	0.0	102.6

Total uncontrolled emissions based on rated capacity at 8760 hours.

**Limited Emissions (tons/year, controlled)**

Emissions Generating Activity							
Pollutant	Cupolas	Annealing Oil Addition	Blow Chambers	Surface Coating	Board ** Cutting	Combustion	Total Emissions (tons/yr)
PM	79.9	0.0	30.0	2.8	0.2	1.9	114.8
PM10	79.9	0.0	30.0	2.8	0.2	1.9	114.8
SO2	199.7	0.0	2.2	0.0	0.0	0.2	202.1
NOx	39.9	0.0	0.2	0.0	0.0	25.1	65.2
VOC	1.7	49.5	3.5	287.9	0.0	1.4	344.0
CO	6241.5	0.0	0.0	0.0	0.0	21.1	6262.6
Total HAPs	102.6	0.0	0.0	0.0	0.0	0.0	102.6
Worst Case Single HAP	102.6	0.0	0.0	0.0	0.0	0.0	102.6

\*\* PM & PM-10 emissions from board cutting were based on calculated emissions provided by the applicant.

Per 326 IAC 6-3, the allowable PM emissions due to board cutting (with a maximum process weight rate of 2.57 tons/hr) are;

$$4.10 * (2.57)^{0.67} = 7.72 \text{ lb/hr}$$

# Appendix A: Mineral Wool Production

Page 2 of 4 TSD App A

Company Name: The Celotex Corporation  
Address City IN Zip: 1400 West Main Street, Lagro, IN  
CP: T169-6367  
Pit ID: T169-00001  
Reviewer: Scott Pan/EVP  
Date: Nov. 6, 1998

SCC# 3-05-017-01 Cupolas #2 & #3							
TYPE OF PRODUCT	Throughput LBS/HR	1 TON/2000 lbs	TON/HR				
Mineral Wool	11400	2000	5.7				
Emission Factors (1)	PM lbs/ton Product 16.00	PM10 lbs/ton Product 16.00	SOx lbs/ton Product 8.00	NOx lbs/ton Product 1.60	VOC lbs/ton Product 0.07000000000000001	CO lbs/ton Product 250	Carbony Sulfide (COS) lbs/tons Raw Material (2) 2.54
Potential Emissions (lbs/hr)	91.2	91.2	45.6	9.1	0.4	1425.0	23.4
Potential Emissions (tons/yr)	399.5	399.5	199.7	39.9	1.7	6241.5	102.6
Controlled Emissions (lb/hr)	18.2 (9.1 lb/hr each cupola) (3)	18.2	45.6	9.1	0.4	1425.0	23.4
Controlled Emissions (tons/yr)	79.9	79.9	199.7	39.9	1.7	6241.5	102.6

(1) Emissions for each cupola are calculated with the maximum product rate of 2.85 tons mineral wool per hour (based on maximum raw material throughput of 4.61 tons per hour).

(2) Calculation of the uncontrolled COS emissions were based on the emission factors determined in the stack test for the applicant's other similar mineral wool cupola and the raw material throughput of 4.611 tons per hour.

(3) Compliance with 326 IAC 6-3-2: For each cupola, the maximum raw material process wt. rate is 4.61 ton/hr and the allowable PM emissions (lb/hr) =  $4.1 * (4.61)^{0.67} = 11.42$  lb/hr.  
The cupolas will be in compliance with the rule by controlling PM emissions with multiclones.

Annealing Oil Addition							
TYPE OF MATERIAL	Throughput LBS/HR	1 TON/2000 lbs	TON/HR				
Annealing Oil	45.22	2000	0.02261				
	PM lbs/ton oil used 0.00	PM10 lbs/ton oil used 0.00	SOx lbs/ton oil used 0.00	NOx lbs/ton oil used 0.00	VOC lbs/ton oil used 500.00	CO lbs/ton oil used 0.00	Carbony Sulfide (COS) lbs/ton oil used 0.00
Potential Emissions (lbs/hr)	0.0	0.0	0.0	0.0	11.3	0.0	0.0
Potential Emissions (tons/yr)	0.0	0.0	0.0	0.0	49.5	0.0	0.0
Controlled Emissions (lb/hr)	0.0	0.0	0.0	0.0	11.3	0.0	0.0
Controlled Emissions (tons/yr)	0.0	0.0	0.0	0.0	49.5	0.0	0.0

SCC# 3-05-17-3 Blow Chambers #2 & #3							
TYPE OF MATERIAL	Throughput LBS/HR	1 TON/2000 lbs	TON/HR				
Mineral Wool	14000	2000	7				
	PM lbs/ton material charged 12.00	PM10 lbs/ton material charged 12.00	SOx lbs/ton material charged 0.09	NOx lbs/ton material charged 0.01	VOC lbs/ton material charged 0.14	CO lbs/ton material charged 0.00	Carbony Sulfide (COS) lbs/ton material charged 0.00
Potential Emissions lbs/hr	84.0	84.0	0.6	0.1	1.0	0.0	0.0
Potential Emissions (tons/yr)	367.9	367.9	2.7	0.3	4.3	0.0	0.0
Controlled Emissions (lb/hr)	8.4 (4.2 lb/hr each chamber) (3)	8.4	2.7	0.3	4.3	0.0	0.0
Controlled Emissions (tons/yr)	36.8	36.8	2.7	0.3	4.3	0.0	0.0

(3) Compliance with 326 IAC 6-3-2: For each blow chamber, the maximum process wt. rate is 3.50 ton/hr and the allowable PM emissions (lb/hr) =  $4.1 * (3.5)^{0.67} = 9.49$  lb/hr (> 4.2 lb/hr).  
The blow chambers will be in compliance with the rule by controlling PM emissions with scrubbers.

**Appendix A: Emission Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: The Celotex Corp.  
Address City IN Zip: 1400 West Main Street, Lagro, Indiana 46941  
CP: T169-6367  
Plt ID: 169-00001  
Reviewer: Scott Pan/EVP  
Date: Oct. 20, 1998**

Potential Emissions (uncontrolled):															
Material (as applied)	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Material Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Paint Booth #1															
Tint-Ayd WD 2432	15.7	40.0%	9.0%	31.0%	9.0%	60.0%	106.0	5.35	4.867	32.86	788.64	143.93	139.28	20.93	50.00%
Paint Booth #2															
Tint-Ayd WD 2432	15.7	40.0%	9.0%	31.0%	9.0%	60.0%	106.0	5.35	4.867	32.86	788.64	143.93	139.28	20.93	50.00%
Total Potential Emissions:										65.72	1577.28	287.85	278.57		
Controlled Emissions:															
Total Controlled Emissions:								Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
								VOC	PM						
								0.00%		99.00%		65.72	1577.28	287.85	2.79

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of coating per hour (lb/hr) \* VOC content (%)

Potential VOC Pounds per Day = Pounds of coating per hour (lb/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of coating per hour (lb/hr) \* VOC content (%) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = Pounds of coating per hour (lb/hr) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Transfer Efficiency

Controlled emission rate = uncontrolled emission rate \* (1 - control efficiency)



**Appendix A: Emission Calculations**  
**Natural Gas Combustion**  
**MM Btu/hr 0.3 - < 100**

**Company Name:** The Celotex Corporation  
**Address City IN Zip:** 1400 West Main Street, Lagro, IN  
**CP:** T169-6367  
**Plt ID:** 169-00001  
**Reviewer:** Scott Pan/EVP  
**Date:** Oct. 20, 1998

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

57.3

501.8

	Pollutant					
Emission Factor in lb/MMCF	PM 7.6	PM10 7.6	SO2 0.6	NOx 100.0	VOC 5.5	CO 84.0
Potential Emission in tons/yr	1.91	1.91	0.15	25.09	1.38	21.07

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32

All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 em

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton